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5 Attorneys for National General Assurance  
6 Company

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 NATIONAL GENERAL ASSURANCE  
11 COMPANY,

12 Plaintiff,

13 vs.

14 DWAIN ROCKWOOD TURNER, an  
individual; DOES I-V,

15 Defendants.  
16

CASE NO. 2:19-cv-01713

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE OPPOSITION  
AND REPLY TO MOTIONS FOR  
SUMMARY JUDGMENT  
(Third Request)**

17 Intervenor, Helal Sekder (“Sekder”), filed a Motion for Summary Judgment Regarding  
18 Coverage on 1/10/20. Plaintiff, National General Assurance Company (“NGAC”) filed an  
19 Opposition to Sekder’s MSJ on 1/30/20. Additionally, NGAC filed a Counter-Motion for Summary  
20 Judgment Regarding Coverage on 1/31/20.

21 The parties had previously stipulated and obtained court approval to extend the time for  
22 Sekder to file his Reply in Support of his Motion for Summary Judgment and his Opposition to  
23 NGAC’s Counter-Motion for Summary Judgment, to March 13, 2020 and March 23, 2020,  
24 respectively. The purpose of the extension was to enable NGAC to effectuate a substitution of  
25 counsel and to allow the parties to further explore settlement potential before incurring additional  
26 time and expense to finish briefing the pending motions.

27 The parties subsequently filed a second stipulation to extend the filing deadlines for another  
28 30 days, to April 13, 2020 and April 23, 2020, due to an unanticipated delay in getting the file

1 transferred from NGAC's former counsel to its new counsel. Additionally, the file was nearly 4,500  
2 pages, and new counsel needed additional time to review the file in order to fully evaluate Sekder's  
3 settlement demand.

4 Since then, counsel for the parties have engaged in good faith settlement negotiations, and a  
5 counteroffer has been made by NGAC to Sekder. Sekder's counsel is working to negotiate with  
6 various lienholders before deciding whether to accept NGAC's settlement offer. However, due to  
7 the current COVID-19 crisis, with many businesses either closed or operating with a skeleton crew,  
8 additional time will be necessary to negotiate the medical liens. Accordingly, the parties hereby  
9 stipulate to extend the deadlines for another 30 days, to May 13, 2020 and May 23, 2020,  
10 respectively, for Sekder to file his Reply in Support of his Motion for Summary Judgment and his  
11 Opposition to NGAC's Counter-Motion for Summary Judgment.

12 This is the parties' third request for an extension of time, and it is being made in good faith  
13 and not for any improper or dilatory purpose.

14 DATED this 9th day of April, 2020.

DATED this 9th day of April, 2020.

15 /s/ Jesse M. Sbaih

/s/ Alice K. Herbolsheimer


16 By: \_\_\_\_\_  
17 Jesse M. Sbaih, Esq.  
18 JESSE SBAIH & ASSOCIATES, LTD.  
19 The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, NV 89012

By: \_\_\_\_\_  
Alice K. Herbolsheimer, Esq.  
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5555 Kietzke Lane, Suite 200  
Reno, Nevada 89511

20 *Attorneys for Intervenor, Helal Sekder*

*Attorneys for Plaintiff, NGAC*

21  
22 IT IS SO ORDERED.

23   
24 RICHARD F. BOULWARE, II  
25 UNITED STATES DISTRICT JUDGE

26 DATED this 10th of April, 2020.  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP Rule 5(b), I certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 9th day of April, 2020, I caused a true and correct copy of **STIPULATION AND ORDER TO EXTEND TIME TO FILE OPPOSITION AND REPLY TO MOTIONS FOR SUMMARY JUDGMENT (Third Request)** to be served via the court's electronic system to the following:

Jesse M. Sbaih, Esq.  
JESSE SBAIH & ASSOCIATES, LTD.  
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Steven C. Devney, Esq.  
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By /s/ Sherie Morrill  
An Employee of  
LEWIS BRISBOIS BISGAARD & SMITH LLP